

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

IN RE: ASHLEY MADISON CUSTOMER DATA)	
SECURITY BREACH LITIGATION)	
)	MDL No. 2669
This Document Relates to:)	
)	4:15-MD-2669-JAR
ALL CASES)	
)	

**DECLARATION OF BRIAN DEVERY
ON COST FOR NOTICE PROGRAM**

I, Brian Devery, hereby declare as follows:

1. I submit this declaration to supplement the prior declaration of Steven Weisbrot, filed on July 17, 2017 (Doc. No. 344-3) and to provide the Court with additional information regarding the reasonableness of the cost of administration.

2. I am a Project Manager with Angeion Group (“Angeion”), the settlement administrator retained in this matter. Angeion’s office is located at 1801 Market Street, Suite 660, Philadelphia, PA 19103. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto.

3. Angeion provided the parties with an estimated cost for administration of the settlement totaling \$309,240. The estimate of cost for administration contains certain assumptions about information not currently ascertainable, including but not limited to the number of claims that will ultimately be filed and the amount of class member communication that will be required. The assumptions made are reasonable in my experience, but the cost of administration is subject to change as the administration progresses.

4. Based on the Notice Plan in this matter, as more specifically detailed in the declaration of Steven Weisbrot and the Notice Plan, which combines a print media campaign, national press release, and a state-of-the-art targeted internet banner ad notice campaign based on objective syndicated data to reach our target audience, notice is designed to deliver an approximate 75.3% reach with an average frequency of 3.04 times each.

5. In my experience, the estimated costs of notice and administration are fair and reasonable.

I hereby declare under penalty of perjury that the foregoing is true and correct.


Brian Devery

Dated: July 20, 2017